IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS FORT WORTH DIVISION

LILIAN ONOH, PLAINTIFF,	§ §	
,	§	
VS.	§	CIVIL ACTION NO. 4:25-cv-00298-O
	§	
SAHARA REPORTERS MEDIA GROUP,	§	
INC., and LA KIESHA LANDRUM-PIERRE	, §	
DEFENDANTS.	§	

PLAINTIFF'S MOTION FOR SUBSTITUED SERVICE

TO THE HONORABLE JUDGE OF SAID COURT:

Plaintiff Lilian Onoh files this Motion for Substituted Service on Defendants Sahara Reporters' Media Group, Inc. and La Kiesha Landrum-Pierre. In support of this motion, Plaintiff would show this honorable court as follows:

I. Unsuccessful Personal Service

- 1. Onoh filed this action seeking to recover damages for defamation and intentional infliction of emotional distress caused when the Defendants published false statements about her.
- 2. Onoh forwarded the citations and copies of the *Plaintiff's Original Complaint* to Veronica Solano for service upon Defendant Landrum-Pierre who is both an individual defendant and an officer for Sahara Reporters' Media Group, Inc ("Sahara Reporters"). The address that Onoh found for Defendant Landrum-Pierre was 3648 E. Longridge Dr., Orange, California 92867. Ms. Solano made four (4) separate attempts to personally serve Defendant Landrum-Pierre with this process. All attempts were unsuccessful. Exhibit "1", Affidavit of Veronica Solano.

- 3. Onoh then commissioned a skip trace for Defendant Landrum-Pierre. The result of that trace again returned that Defendant Landrum-Pierre's current address was 3648 E. Longridge Dr., Orange, California 92867. The only other addresses that came up in the trace were 6 and 19 years old. Exhibit "2", Affidavit of Norman Lee Collins.
- 4. Onoh has discovered email addresses for Defendant Landrum-Pierre and for Defendant Sahara Reporters. Those addresses are lakeisha.landrum@gmail.com, customerservice@saharareporters.com, SaharaReportersTV@gmail.com, and marketing@saharareporters.com. Additionally, the skip trace revealed that Defendant Landrum-Pierre is active on several social media platforms including Facebook and LinkedIn. The skip trace also revealed that Defendant Landrum-Pierre has connections to websites such as the Sahara Reporters website (saharareporters.com) and a company called Emmeline Ventures (emmelineventures.vc).

II. Request for Substituted Service

- 5. Based on Solano's attempted service and on the skip trace results, Onoh believes that Defendant Landrum-Pierre and Defendant Sahara Reporters can be served through one of the email addresses for those Defendants. As Defendant Landrum-Pierre is the Chief Executive Officer for Defendant Sahara Reporters, Onoh's service on both Defendants would be effective at any of the email addresses.
- 6. Federal Rule of Civil Procedure 4 (e) allows a Plaintiff to serve an individual in a judicial district of the United States by: (1) following state law for serving a summons in an action brought in courts of general jurisdiction in the state where the district court is located or where service is made... . Fed. R. Civ. P. 4(e).
- 7. Texas Rule of Civil Procedure 106 (b) provides that, upon motion supported by a sworn statement that the defendant may be found at a location where personal service has

been attempted but failed, a court may permit an alternative service including leaving a copy of the citation and petition with someone over the age of sixteen at the location, posting on social media or email, or other manner which is reasonably effective to give notice of the suit to the defendant. *Tex. R. Civ. P.* 106.

- 8. As set forth in her affidavit, Solano was unable to complete service at the only current address Onoh could find for Defendant Landrum-Pierre. Based on the skip trace run by Collins, Solano has no other addresses that could be found. The only addresses that Onoh could find relating to Defendant Landrum-Pierre and Defendant Sahara Reporters were the ones listed in this Motion. Exhibit "3", Declaration of Lilian Onoh.
- 9. Onoh requests that this Court allow her to complete service of process on Defendants serving a copy of the citation, the Original Complaint, and this Court's order to Defendants to the following email addresses: lakeisha.landrum@gmail.com, customerservice@saharareporters.com, SaharaReportersTV@gmail.com, and marketing@saharareporters.com.

WHEREFORE, PREMISES CONSIDERED, Onoh requests that this Court order service on Defendants by the above-referenced methods or in such other manner as this Court finds will be reasonably effective to give the Defendants notice of this suit, and that a true copy of this Court's order for substituted service be attached to and included with the citation and complaint to be served.

Respectfully submitted,

WESTERBURG & THORNTON, P.C. 8080 N. Central Expressway, Suite 1700

Dallas, Texas 75206

Phone No.: 214.528.6040 Facsimile: 214.540.7207

Email: <u>steve@mwtlaw.com</u>

By: Steven Thornton

Steven Thornton State Bar No. 00789678

ATTORNEY FOR PLAINTIFF

AFFIDAVIT OF DUE DILIGENCE

UNITED STATES DISTRICT COURT Northern District of Texas

Case Number: 4:25-cv-00298-O

Plaintiff: Lilian Onoh

VS.

Defendants:

Sahara Reporters Media

Group, Inc. et al.

Received these papers on the 2nd day of April, 2025 at 12:32 pm to be served on Sahara Reporters Media Group, Inc. by and through its Chief Executive Officer, La Kiesha Landrum Pierre, 3648 East Longridge Drive, Orange, Orange County, CA 92867.

I, Veronica Solano, being duly sworn, depose and say that I:

Attempted to deliver the Summons in a Civil Action with Plaintiff's Original Complaint. After my due diligence search, careful inquiry, and diligent attempts, I could not obtain delivery on Sahara Reporters Media Group, Inc. by and through its Chief Executive Officer, La Kiesha Landrum Pierre for the reasons detailed in the comments below. All statements in this document detailing these efforts are based on my personal knowledge and are true and correct.

Additional Information pertaining to this Service:

4/07/2025 3:10 pm Attempted delivery at 3648 East Longridge Drive, Orange, CA 92867. The front door had a surveillance camera. There was no answer. The mailbox says "The Reeds" on it. 4/9/2025 10:10 am Attempted delivery at 3648 East Longridge Drive, Orange, CA 92867. There was no answer at the door. I also tried the neighbors but received no response. 4/12/2025 6:15 pm Attempted delivery at 3648 East Longridge Drive, Orange, CA 92867. There was no answer at the door. I could see lights on inside the home. A Mercedes was parked in the driveway, but it had no front license plate, and I could not see what was listed on the back plate. 4/14/2025 1:45 pm Attempted delivery at 3648 East Longridge Drive, Orange, CA 92867. There was no

answer at the door. The Mercedes was still parked in the driveway. No noticeable changes were made since the previous attempt.

I certify that I am over the age of 21, have no interest in the above action, and am competent to testify. I am an Authorized Process Server in good standing. I have never been convicted of a felony or misdemeanor involving moral turpitude in any state. All statements contained herein are based on my personal knowledge and are true and correct.

State of Coli Fornia, lounty of Orange Subscribed and Sworn to before me on the

5th day of May

by the affiant who personally appeared.

Orange County; #6230

Our Job Serial Number: PEL-2025001579

Copyright @ 1992-2025 DreamBuilt Software, LLC. - Process Server's Toolbox V

B. CAMANOS JIMENEZ S COMM. # 2474007 NOTARY PUBLIC - CALIFORNIA ORANGE COUNTY 0 COMM. EXPIRES NOV. 27, 2027

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.



SKIP TRACE REPORT

Documer **XHIBLT** 0'20'6/25

UNITED STATES DISTRICT COURT Northern District of Texas

Case Number: 4:25-cv-00298-O

Plaintiff: Lilian Onoh

Defendants: Sahara Reporters Media

Group, Inc. et al.

RESULTS: According to the skip trace reports, 3648 E LONGRIDGE DR, ORANGE, CA, 92867 is still

showing as the most recent address. I found no property or vehicles registered in her name.

She holds a California Driver's license issued in 2006. I believe, based on the address 1 LMU DR # MS2025, LOS ANGELES, CA 90045-2623, she was attending Loyola Marymount University.

Website - https://saharareporters.com

Facebook - https://www.facebook.com/search/top?q=la%20kiesha%20landrum-pierre

Linkenin - https://www.linkedin.com/in/Inlpierre

Website - https://www.emmelineventures.vc (According to her Linkedin profile she is also the Chairwoman

for Emmeline Ventures)

Unfortunately, none of the social media revealed any other address information.

Possible cell - 617-863-0799. This appears to be a valid number. I called and left a message.

There is a federal tax lien that was recorded 2/19/2019, and at that time, she was living at 146 W 57TH ST APT 51E, NEW YORK, NY, 10019.

I believe she travels internationally and has relevant ties to Nigeria.

Also, the server that attempted service indicated that he thought the current occupants were the Reeds. I found that Louis Bayliss-Reed and Lawrence Reed are, by phone listings, the current occupants of 3648 E LONGRIDGE DR, ORANGE, CA 92867-2023 (ORANGE COUNTY).

My name is Norman Lee Collins, I am at least 18 years old, and my address is 18601 LBJ Freeway, Suite 220, Mesquite, TX 75150, USA. I declare under penalty of perjury that the foregoing is true and correct. Executed in Dallas County, State of Texas, on the 2nd day of June 2025.

> Norman Lee Collins PSC360; EXP. 7/31/2026

Our Job Serial Number: PEL-2025002275



IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS FORT WORTH DIVISION

LILIAN ONOH,	§	
PLAINTIFF,	§	
	§	
VS.	§	CIVIL ACTION NO. 4:25-cv-00298-O
	§	
SAHARA REPORTERS MEDIA GROUP,	§	
INC., and LA KIESHA LANDRUM-PIERRI	E,§	
DEFENDANTS.	§	

DECLARATION OF LILIAN ONOH

THE STATE OF TEXAS	§
	§
COUNTY OF TARRANT	ξ

- I, the undersigned, am over 21 years of age, of sound mind, capable of making this 1. Declaration, and have personal knowledge of the facts herein stated:
- I am the Plaintiff in the above-styled and numbered cause. 2.
- This case involves lies and defamatory statements that have been published about me 3. by Defendant Sahara Reporters Media Group, Inc. ("Sahara Reporters") and Defendant La Kiesha Landrum-Pierre on the website for Saraha Reporters.
- I understand that the process server that I hired was unable to serve Defendant 4. Landrum-Pierre at the only address that we could find for her. I also understand that a skip trace was run for Defendant Landrum-Pierre and that revealed no other addresses.
- I have found four email addresses for either Defendant Sahara Reporters and/or 5. Defendant Landrum-Pierre. Those addresses are: lakeisha.landrum@gmail.com, customerservice@saharareporters.com, SaharaReportersTV@gmail.com, and marketing@saharareporters.com.

- 6. From postings made on different websites and social media, I understand that these addresses are still in use by the Defendants. I have attached some of the postings showing the use of those addresses as an exhibit to this declaration.
- 7. Given that a number of unsuccessful attempts were made to serve Defendants at Defendant Landrum-Pierre's residence, I am requesting that this Court allow me to serve the Citation, Complaint, and a copy of the Order allowing substituted service on the Defendants by emailing those documents to the four email addresses I have provided.
- 8. I believe that service on the Defendants through these email addresses will be sufficient to give the Defendants notice of this suit.

My name is Lilian Onoh. My date of birth is _____. My address is c/o Westerburg & Thornton, P.C., 8080 North Central Expressway, Suite 1700, Dallas, Texas 75201. I declare under penalty of perjury that the foregoing is true and correct.

Executed in Tarrant County, State of Texas, on the _____ day of June, 2025.

Lilian Onoh



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Document 4

Filed 06/06/25





º⁻ sec.gov/Archives







The Securities and Exchange Commission has not necessarily reviewed the information in this filing and has not determined if it is accurate and complete.

The reader should not assume that the information is accurate and complete.

UNITED STATES SECURITIES AND EXCHANGE COMMISSION
Viashington, D.C. 20549
FORM D

Notice of Exempt Offering of Securities

OMB APPR	OVAL
OMB Number:	3235-0076
Estimated average burds	en
hours per response:	4.00

1. Issuer's Identity

CIK (Filer ID Number)	Previous Names	XNone	Entity Type
Name of Issuer Emmeline Ventures Fund I, LP Jurisdiction of Incorporation/Organization DELAWARE Year of Incorporation/Organization			Corporation X Limited Partnership Limited Liability Company General Partnership Business Trust
Over Five Years Ago X Within Last Five Years (Specify Year) 2021 Yet to Be Formed			Other (Specify)

2. Principal Place of Business and Contact Information

Name of Issuer			
Emmeline Ventures Fund I, LP			
Street Address 1		Street Address 2	
10645 Tatum Blvd, Suite 200-256			
City	State/Province/Country	ZIP/PostalCode	Phone Number of Issuer
Phoenix	ARIZONA	85028	(503) 740-3262

3. Related Persons

Last Name	First Name	Middle Name	
Emmeline Ventures GP I, LLC	£		
Street Address 1	Street Address 2		
10645 Tatum Blvd, Suite 200-256			
City	State/Province/Country	ZIP/PostalCode	
Phoenix	ARIZONA	85028	
Relationship: Executive Officer Director X Promoter			

Clarification of Response (if Necessary):

General Partner of the Issuer

Last Name	First Name	Middle Name	
Goddess Pack Ventures Management, LLC	•		
Street Address 1	Street Address 2		
10645 Tatum Blvd, Suite 200-256			
City	State/Province/Country	ZIP/PostalCode	
Phoenix	ARIZONA	85028	
Relationship: Executive Officer Director X Promoter			

Clarification of Response (if Necessary):

Management Company of the Issuer

Last Name	First Name	Middle Name	
Last Name	First Name	Middle Name	
Pierre	La Keisha	Landrum	
Street Address 1	Street Address 2		
c/o Emmeline Ventures GP I, LLC	3648 East Long Ridge Drive		
City	State/Province/Country	ZIP/PostalCode	
ORANGE	CALIFORNIA	92867	
Relationship: X Executive Officer Direct	or Promoter		

Clarification of Response (if Necessary):

Manager of the General Partner of the Issuer

Van Alebeek Street Address 1	First Name Azin Street Address 2	Azin		Middle Name Radsan	
	\triangleleft	\bigcirc			



=

+1.6178632121 and +1.6174956528.

How to contact La Keisha Landrum Pierre?

To contact La Keisha Landrum Pierre send an email to lakeisha.landrum@gmail.com or la@emmelineventures.vc. If you want to call La Keisha Landrum Pierre try calling on +1.6178632121 and +1.6174956528.

What company does La Keisha Landrum Pierre work for?

La Keisha Landrum Pierre works for Sahara Reporters Media Group

What is La Keisha Landrum Pierre's role at Sahara Reporters Media Group?

La Keisha Landrum Pierre is Chairwoman, Former Chief Executive Officer

What industry does La Keisha Landrum Pierre work in?

La Keisha Landrum Pierre works in the Online Media industry.

13:26

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Document 4



Frequently Asked Questions about La Keisha Landrum Pierre

What is La Keisha Landrum Pierre email address?

Email La Keisha Landrum Pierre at lakeisha.landrum@gmail.com and la@emmelineventures.vc. This email is the most updated La Keisha Landrum Pierre's email found in 2025.

What is La Keisha Landrum Pierre phone number?

La Keisha Landrum Pierre phone number is +1.6178632121 and +1.6174956528.

How to contact La Keisha Landrum Pierre?

To contact La Keisha Landrum Pierre send an email to lakeisha.landrum@gmail.com or la@emmelineventures.vc. If you want to call La Keisha Landrum Pierre try calling on +1.6178632121 and +1.6174956528.

What company does La Keisha Landrum Pierre work for?

La Keisha Landrum Pierre works for Sahara Reporters Media Group







13:25



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La Keisha Landrum Pierre Work

- Chairwoman, Former Chief Executive Officer at Sahara Reporters Media Group in January 2015 to Present
- Board Member, Co-Founder at Civic Media Lab in May 2017 to Present
- Managing Director, Co-Founder at **Emmeline Ventures** in January 2022 to Present

See more V

La Keisha Landrum Pierre Skills

- **Q** Creative Writing
- **Pundraising**
- Q Public Relations

See more V

About La Keisha Landrum Pierre's **Current Company**

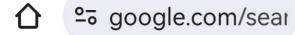
Sahara Reporters Media Group

Discover more about Sahara Reporters Media Group













Emmeline Ventures careers

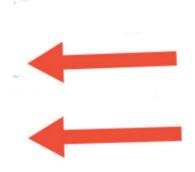




ContactOut https://contactout.com

La Keisha Landrum Pierre Email & Phone Number | Sahara...

To contact La Keisha
Landrum Pierre send an
email to
lakeisha.landrum@gmail.co
m or
la@emmelineventures.vc. If
you want to call La Keisha
Landrum ...



Images



La Keisha Landrum Pie...



Show Her the Money ...







EMMELINE ventures



haystack, dig through the coal mine. They believe a great founder can be found anywhere. Join us in funding the future.

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Your Name*









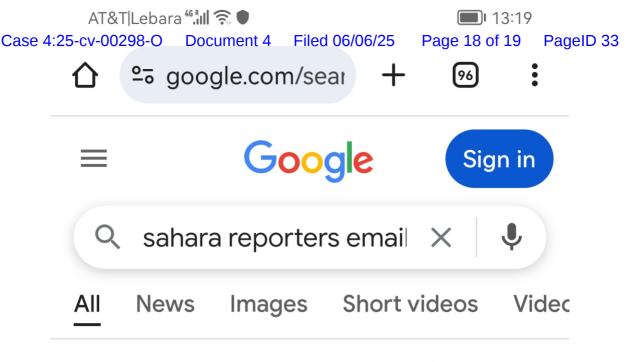
Privacy Policy at any time by submitting a request to customerservice@saharareporters.com. Your continued use of any portion of the Website or SaharaReporters.com service following the posting of the revised policy will constitute your acceptance of the changes.

How to contact us if you believe your privacy has been violated

If you suspect that your privacy has been violated or that
SaharaReporters.com has not abided by the terms set forth in this policy, contact SaharaReporters.com by emailing

customerservice@saharareporters.com









Sahara Reporters has two main email addresses for general inquiries and advertising. To submit citizen reporting material, use saharareporterstv@gmail.com.

For customer service or privacy policy requests, use customerservice@saharareporters .com. If you are interested in advertising, you can email marketing@saharareporters.com or use the form on the Sahara Reporters website.

Advertise - Sahara Reporters





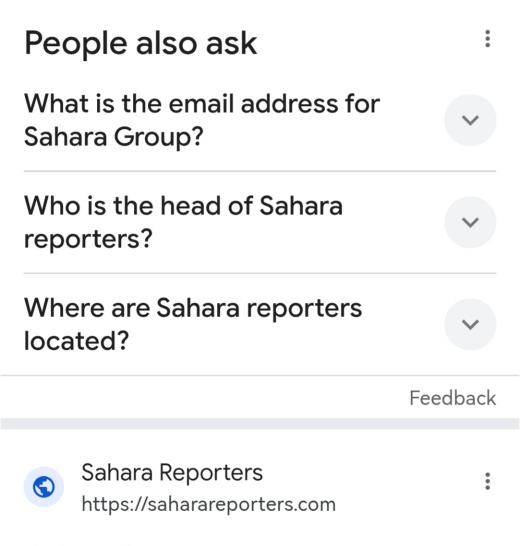






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